

Before the  
Federal Communications Commission  
Washington, DC 20554

In the matter of	)	RM-10740
<b>Rulemaking</b> under Part 97 of	)	
The Communications Act of 1934 (sic)	)	
As Amended to Establish Technical	)	
Standards for Certain Amateur	)	
Radio Telephony Transmissions	)	

Comments by Mark S. Bell

27 July 2003

To: The Commission:

I wish to voice my **opposition** to RM-10740.

1. The petitioners have not provided proof that such experimentation is significantly affecting the Amateur Radio spectrum to warrant a modification of the existing FCC rules governing Amateur Radio operations. The petitioners state that the transmitting of wide band signals on crowded amateur bands has “according to the Commission’s Enforcement Division, generated up to twenty complaints per week to the commission”. Over how long a period did this occur? Were the twenty complaints from unique individuals? The petitioners further state that “one group appears on the amateur bands during international radio contests, tweaking and adjusting their transmitters to splatter purposely, in order to provide themselves ‘elbowroom’ during a contest on a very crowded band” How do the petitioners know this is being done on purpose? No evidence has been presented to support this allegation. From this kind of statement, one could suggest that the petitioners are upset that spectrum is not available for them to pursue contesting operations, and they wish to have the rules changed to favor their particular operating tastes. This could or could not be the case. The point in both examples is that sufficient objective evidence has not been presented by the petitioners to warrant such drastic action as changing the rules as they now stand.

2. Over at least the past four decades, commercially manufactured Amateur Radio equipment has set bandwidth standards of 3.1 KHz for SSB (Type J3E) emissions, and 6 KHz for AM (Type A3E) emissions. Since the FCC has not chosen to take enforcement action against these manufacturers in over forty years, one can assume that these standards are acceptable to the Commission to represent “good engineering and good amateur practice”. Amateur self-policing in this area has worked very well in these forty years, as well as the Commissions enforcement ability under the existing rules and regulations.

3. If the petitioners request were to be granted, I submit that it is beyond the technical ability of the average radio amateur to ensure that the absolute bandwidth limits were being met. This would probably cause most amateurs to unnecessarily limit their bandwidth to provide a margin of error causing significant degradation of voice transmission on the Amateur Bands. Who would enforce such new absolute bandwidth limits? Official Observers (OO) stations would need to ensure that any equipment utilized was calibrated in a periodic manner, and the operators of such stations were certified to make such determinations. This would cause undue financial burden on these amateurs. In times of limited budget constraints, I seriously doubt the Commission has the resources to monitor excess absolute bandwidth situations.

4. The petitioners state that Double Side Band AM (Type A3E) emissions are not a problem, yet they still ask for bandwidth limitations for AM ! They provide absolutely no evidence as to why this should be done, state that AM bandwidth is not a problem, yet want it limited! Why? The Commission should not act on rule making matters based upon a complete lack of any compelling reason or evidence!!

Conclusion:

I have been an amateur radio operator for 30 years, and have held my Extra Class license for 25 years. I operate AM, SSB, and CW, and have no interest in wide band SSB Telephony.

***I request the commission dismiss RM-10740 based upon the lack of sufficient evidence and lack of compelling reason provided by the petitioners.***

Thank you

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